

Magistrate Judge Brian A. Tsuchida

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OCT 30 2024

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

v.

ANTENEH TESFAYE,
Defendants.

CASE NO. MJ24-694

COMPLAINT for VIOLATION

18 U.S.C. Section 922(g)(1)

BEFORE BRIAN A. TSUCHIDA, United States Magistrate Judge, U. S.
Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT 1

(Unlawful Possession of a Firearm)

On or about October 30, 2024, in Snohomish County, within the Western District
of Washington, Anteneh TESFAYE aka "Anteneh Tedasse" (hereafter, TESFAYE),
knowing he had been convicted of the following crimes punishable by a term of
imprisonment exceeding one year:

- i. *Robbery in the First Degree*, in Superior Court of Washington for King County, under case number 05-C-06766-3 KNT, on or about January 20, 2006; and
- i. *Residential Burglary*, in Superior Court of Washington for King County, under case number 05-1-07590-9 KNT, on or about October 31, 2008;

did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is: a FNH model 509, that had been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

And the complainant states that this Complaint is based on the following information:

I, Jonas Restad, being first duly sworn on oath, depose and say:

AFFIANT BACKGROUND AND QUALIFICATIONS

1. I am a “law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7). Specifically, I am a Special Agent (SA) with Homeland Security Investigations (“HSI”) within the United States Department of Homeland Security (DHS). As a Special Agent, I investigate violations of the Controlled Substance Act, Title 21, United States Code, Section 801, et seq., and other violations of federal law, to include violations of Title 18, United States Code, Section 922. I have been a Special Agent with HSI since April 2021. I was trained to conduct investigations relating to violations of federal law including the manufacturing and trafficking of controlled substances and money laundering through the Criminal Investigator Training Program and the Homeland Security Investigations Special Agent Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. My training and experience in narcotics enforcement has included the identification of narcotics, including fentanyl, cocaine, methamphetamine, heroin, opium, MDMA, and marijuana,

1 and the investigation of persons in possession of narcotics for purposes of sales and
2 transportation, as well as persons conspiring to transport and sell narcotics.

3 2. As a federal law enforcement officer, I have received formal training, as
4 well as on-the-job training, in the investigation of narcotics trafficking. I have
5 participated in investigations involving controlled substances, money laundering, and
6 other criminal activity. I am familiar with how drug traffickers use, sell, conceal, and
7 transport, controlled substances. I have been involved in drafting and executing a number
8 of search warrants, conducting controlled narcotics buy operations, and arresting those
9 involved in controlled substances trafficking. I also speak regularly with narcotics
10 investigators at the federal, state, and local level, sellers of narcotics, and informants
11 regarding the manner in which sellers of narcotics store, sell, transport, and communicate
12 about narcotics.

13 3. I am also familiar with the methods employed by narcotics traffickers to
14 conceal their trafficking activity and the origin of proceeds generated by this activity. I
15 am aware that traffickers use slang and coded words, multiple cell phones, concealed
16 compartments, "stash" houses to conceal their activities, and launder or otherwise
17 conceal cash proceeds by hiding and transporting bulk cash, sending funds through wire
18 transfers or bank accounts in other persons' names, and/or investing in assets placed in
19 other persons' names.

20 4. I know that persons who illegally possess and distribute controlled
21 substances often possess firearms and ammunition to protect themselves, their drugs, and
22 their drug proceeds from others. Drug dealing is often a cash business, and dealers often
23 maintain firearms and ammunition to protect their drugs and cash. I also know that drug
24 dealers will often need and use firearms to help them intimidate potential rivals and to aid
25 in the collection of drug debts. Therefore, I know that firearms and ammunition, knives
26 and other weapons are often found at the location of narcotic search warrants, referred to
27 in communications, and on persons involved in drug dealing and trafficking.

1 5. I know from my training and experience drug dealers often use their
2 vehicles to conduct and facilitate their drug distribution activities. Drug dealers
3 commonly store drugs and drug proceeds at their residences or stash houses and then
4 transport them to/away from their residences or the stash houses in their vehicles. Drug
5 dealers also commonly use their vehicles to transport drugs and drug proceeds between
6 stash houses and their customers. Additionally, drug dealers sometimes store drugs and
7 drug proceeds in their vehicles so that law enforcement officers searching their residences
8 do not discover them.

9 6. This application is based on information I have gained from my own
10 investigation, personal observations, training, and experience, as well as information
11 related to me by other detectives, police officers, and/or federal agents through oral and
12 written reports. In addition, I have reviewed and am familiar with the investigative file in
13 this matter.

14 INVESTIGATION AND PROBABLE CAUSE

15 Background of Investigation

16 7. This investigation arose from a drug trafficking investigation conducted out
17 of the Western District of Pennsylvania (WDPA). As a result of that earlier investigation,
18 29 defendants were charged on December 20, 2022, in the WDPA for violation of Title
19 21, United States Code, Section 846, Conspiracy to Distribute Controlled Substances
20 (including cocaine, fentanyl, and methamphetamine), and other federal offenses. *See*
21 WDPA Case No. CR22-021. The WDPA conspiracy spanned several states, including
22 Pennsylvania, Arizona, and Washington.

23 8. In late February 2023, based on evidence gathered in the WDPA
24 investigation and related searches in this District, seven additional defendants were
25 charged in this District with Conspiracy to Distribute Controlled Substances and/or
26 Possession with Intent to Distribute Controlled Substances (WDWA Case No. CR23-
27 025-TL). These additional defendants were arrested in early March 2023.

1 9. Since then, agents have continued to investigate additional members of the
2 DTO operating here in this District, to include Amir OSMAN, Muhamed CEESAY, Ali
3 KUYATEH, and Lamin SAHO.

4 10. On May 8, 2024, in WDWA Cause No. GJ24-321, the Honorable U.S.
5 District Court Judge John H. Chun authorized the interception of electronic
6 communications over Amir OSMAN's Snapchat account with username "twoprezz"
7 (Target Account 14, or "TA14"). Investigators began intercepting electronic
8 communications occurring over this account beginning that same day, on May 8, 2024.
9 Pursuant to the terms of the order, interception over TA14 ended on June 6, 2024.

10 11. On June 26, 2024, in WDWA Cause No. GJ24-425, the Honorable U.S.
11 District Court Judge John H. Chun signed an order authorizing the interception of wire
12 and electronic communications over Muhamed CEESAY's telephone (206) 751-9426
13 (TT30). Investigators began intercepting wire and electronic communications occurring
14 over this account beginning that same day, on June 26, 2024. Pursuant to the terms of the
15 order, interception over TT30 ended on July 25, 2024.

16 12. During interception of TT30, investigators identified the user of phone
17 number (206) 683-2980 to be an individual who appears to occupy a leadership role in
18 this drug trafficking organization (DTO), as well as in several other DTOs. Investigators
19 initially identified this individual as "unidentified male x2980" or "UM2980" and by his
20 nickname, "Pops." As discussed below, investigators have since positively identified
21 UM2980/Pops to be Ali KUYATEH.

22 13. On August 12, 2024, in WDWA Cause No. GJ24-524, the Honorable U.S.
23 District Court John H. Chun authorized the interception of wire and electronic
24 communications over KUYATEH's telephone (206) 683-2980 (TT35), SAHO's
25 telephone (929) 371-1019 (TT37), and CEESAY's telephone (206) 255-0855 (TT45).
26 Investigators began intercepting wire and electronic communications occurring over
27

1 these telephones beginning that same day, on August 12, 2024. Pursuant to the terms of
2 the order, interception over TT35, TT37, and TT45 ended on September 10, 2024.

3 TESFAYE is Intercepted Arranging Drug Transactions

4 14. During interception over KUYATEH's phone (TT35), on August 27, 2024
5 at 5:46 p.m., TEFAYE (206) 557-8332 called KUYATEH (Session 6217). In that call,
6 TEFAYE told KUYATEH (TT35), "I need to re-up and then... I got money for you, too,
7 now." TEFAYE then specified what narcotics he wanted: "I need the Supermans you
8 had... I need the – if you could get uh... probably the twenties." The term "superman" is
9 commonly used to refer to multiple different types of narcotics, including cocaine and LSD.
10 In this context however, it appears TEFAYE is referring to pills as he referenced
11 milligrams. Investigators believe these pills were likely MDMA, as they know from
12 training and experience that there is a specific type of ecstasy called "Superman." The pills
13 are commonly embossed with the Superman logo. KUYATEH responded "Okay just give
14 me a call and I'll come – come meet up with you." At 10:14 p.m., TEFAYE called
15 KUYATEH (TT35), who stated, "I'll be around in about thirty" (Session 6356). TEFAYE
16 asked "where you going, Pop? The house?" KUYATEH affirmed. In the above calls,
17 investigators believe that TEFAYE was attempting to source narcotics from KUYATEH,
18 as well as repay KUYATEH for narcotics he had sourced previously. KUYATEH and
19 TEFAYE appeared to plan to conduct this transaction at "the house," which as discussed
20 above is one of the drug-involved premises run by KUYATEH.

21 15. In another call on September 6, 2024, at 10:36 p.m., TEFAYE called
22 KUYATEH and asked for cocaine (Session 9479). During the call, TEFAYE stated "okay
23 you know what, I'll just wait... uh next week, remember I was supposed to grab the white
24 girl?" Investigators know based on training and experience that "white girl" is common
25 drug slang for cocaine. In this call, therefore, it appears TEFAYE stated that he needed
26 to pick up cocaine from KUYATEH but that he would wait and do it next week.

TESFAYE's Snapchat Communications

16. On June 27, 2024, investigators reviewed public Snapchat posts from TESHAYE's Snapchat account with username "kinganteneh" that reflected he possessed firearms in conjunction with his drug trafficking.¹ A video posted to the account on June 27, 2024 at 1:30 p.m. depicted a handgun sitting on a table, along with a spread-out stack of \$100 dollar bills, which appears to total thousands of dollars. The video was captioned "Got that FN... 4 you fuccc.N****s," as depicted below:



¹ Records obtained from T-Mobile reflect that (206) 557-8332 has been subscribed to Anteneh TESHAYE at the address 9114 236th St SW, Apt 4, Edmonds, WA since November 15, 2017. Investigators have also determined that x8332 is associated with a Snapchat account with the username "kinganteneh." The apparent user of this account, depicted in public posts, resembles TESHAYE's Washington driver's license photo. Investigators also note that the username for the account, "kinganteneh," includes TESHAYE's first name "Anteneh." Additionally, investigators queried the number assigned to x8332 in a law enforcement database, which returned a report from Seattle Police Department dated June 02, 2024 (report number 2024-149211) that reflects this number is associated with TESHAYE.

17. Based on investigators training and experience, including specifically with this DTO, videos such as these that depict firearms and currency are commonly posted to social media as a way to brag about the poster's success in drug trafficking.

18. In September 2024, after viewing the above video, a UC agent posing as a firearms buyer exchanged messages with TESHAYE through his Snapchat account. During the correspondence, TESHAYE stated "Got FNS09, but I ain't letting that for below 1500\$." In this way, TESHAYE confirmed he is in possession of an FNS-9 (a 9mm pistol).

Search of TESHAYE's Residence

19. In WDWA Cause No. MJ24-685, investigators obtained a warrant to search TESHAYE's residence, located at 9114 236th St SW, Apartment D4, Edmonds, WA 98026, for evidence of drug trafficking and associated firearms offenses.

20. Investigators executed the warrant at TESHAYE's residence on October 30, 2024. Following the search of TESHAYE's residence, I spoke to an investigator conducting a search of the residence who informed me of the following:

a. TESHAYE was the sole occupant of the residence at the time investigators searched the residence;

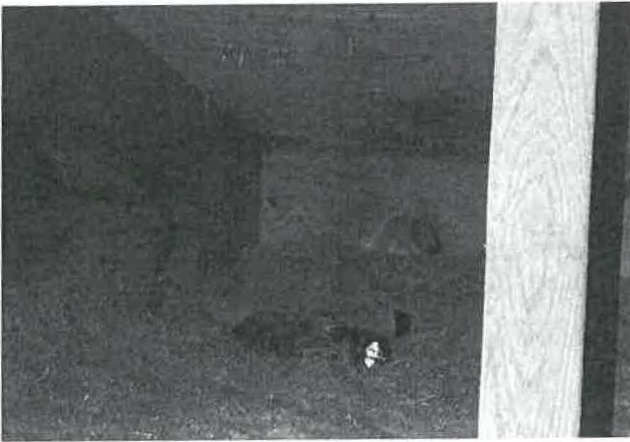
b. Investigators recovered a stolen, loaded FNH model 509 pistol from the attic of the residence.² A photo of the firearm, as it was found, is included below:

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² Investigators queried the firearm through NCIC, which reflected that it was stolen. The firearm had a 9mm round in the chamber and a number of 9mm rounds in the magazine that was inserted into the firearm.



c. Investigators also found a number of documents in the residence, including a Sound Credit Union document in the name “Anteneh Tesfaye” and an Ethiopian passport in the name “Anteneh Tesfaye Tedasse;” and

d. Investigators spoke to the on-site property manager who stated that ~~TESFAYE is sole occupant of Apartment D4.~~ *JRR lives in*


21. An Alcohol Tobacco and Firearms (ATF) firearms interstate nexus expert has examined the photograph in the previous paragraph and has communicated to me that it depicts a real firearm (an FNH model 509 pistol), and that this firearm was not manufactured in the State of Washington and had thus been transported in interstate or foreign commerce prior to being possessed by TESHAYE.

22. Anteneh TESHAYE has at least the following felony convictions for which he was sentenced to a term of imprisonment exceeding one year that prohibit him from possessing firearms pursuant to 18 United States Code Section 922(g)(1):

- ii. *Robbery in the First Degree*, in Superior Court of Washington for King County, under case number 05-C-06766-3 KNT, on or about January 20, 2006; and
- ii. *Residential Burglary*, in Superior Court of Washington for King County, under case number 05-1-07590-9 KNT, on or about October 31, 2008.

1 CONCLUSION

2 Based on the above facts, I respectfully submit that there is probable cause to
3 believe that Anteneh TESFAYE did knowingly and intentionally unlawfully possess a
4 firearm, in violation of Title 18, United States Code, Section 922(g)(1).
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9 Jonas Restad, Complainant
10 Special Agent, Homeland Security
11 Investigations

12 Based on the Complaint and Affidavit sworn to before me, and subscribed in my
13 presence, the Court hereby finds that there is probable cause to believe the Defendant
14 committed the offense set forth in the Complaint.

15 Dated this 30th day of October 2024.
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18 BRIAN A. TSUCHIDA
19 United States Magistrate Judge
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